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Acting United States Attorney
District of Nevada
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Attorneys for Defendant

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

SHERMAINE CARROLL,

Plaintiff,

v.

NANCY A. BERRYHILL,
Acting Commissioner of Social Security,

Defendant.

Case No. 2:17-cv-02237-MMD-PAL

**JOINT STIPULATION AND [PROPOSED]
ORDER FOR EXTENSION OF TIME TO
RESPOND TO PLAINTIFF'S MOTION FOR
REVERSAL OR REMAND**

IT IS HEREBY STIPULATED, by the parties, through their respective counsel of record, that the time for responding to Plaintiff's Motion for Reversal and/or Remand be extended for one week from March 2, 2018 to **March 9, 2018**. This is Defendant's third request for extension. Good cause exists to grant Defendant's request for extension. Counsel for Defendant has a debilitating migraine that impairs her vision on the date of the current filing deadline. In addition, Counsel has over 75+ active pending matters, of which require 2+ dispositive motions until mid April. Counsel also has three pending Ninth Circuit matters which require additional levels of review due in early March. Due

1 to unanticipated leave and high workload demands, Counsel needs additional time to properly respond
2 to Plaintiff's Motion for Summary Judgment. Counsel apologizes for the belated request but did not
3 anticipate being out on leave due to her debilitating migraine. Defendant makes this request in good
4 faith with no intention to unduly delay the proceedings. The parties further stipulate that the Court's
5 Scheduling Order shall be modified accordingly.
6

7 Respectfully submitted,
8

9 Dated: March 2, 2018

/s/ *Cyrus Safa
(*as authorized by email on March 2, 2018)
CYRUS SAFA
Attorney for Plaintiff

13 Dated: March 2, 2018

DAYLE ELIESON
Acting United States Attorney
DEBORAH LEE STACHEL
Regional Chief Counsel, Region IX
Social Security Administration

17 By /s/ Tina L. Naicker
18 TINA L. NAICKER
19 Special Assistant U.S. Attorney
Attorneys for Defendant

20 **ORDER**

21 APPROVED AND SO ORDERED:
22

23
24 DATED: March 7, 2018


THE HONORABLE PEGGY A. LEEN
UNITED STATES MAGISTRATE JUDGE

1 **CERTIFICATE OF SERVICE**

2 I, TINA L. NAICKER, certify that the following individual was served with a copy of the
3 **JOINT STIPULATION AND [PROPOSED] ORDER FOR EXTENSION OF TIME TO**
4 **RESPOND TO PLAINTIFF'S MOTION FOR REVERSAL OR REMAND** on the date and via
5 the method of service identified below:

6 **CM/ECF:**

7
8 Cyrus Safa
9 Law Offices of Lawrence D. Rohlfinding
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23 Attorneys for Plaintiff

24
25 Respectfully submitted this 2nd day of March 2018,

26
/s/ Tina L. Naicker
TINA L. NAICKER
Special Assistant United States Attorney